

## REMARKS

Claims 1-53 are pending in this application. The Office Action dated July 3, 2001, rejected Claims 1-53 and also objected to Claim 11. Applicants have amended the Specification and Claims 1, 11 and 24 – 28 to correct informalities and further clarify the subject matter of the claimed invention.

### I. Objections Under 37 CFR 1.75(c) And Specification Informalities

The Office Action raised an objection to the disclosure because, on page 11, the reference number 138 was used for both “slide control” and “help button.” In response, applicants submit, herewith, an amendment to correct this informality by replacing the reference number 138 with the reference number 140.

The Office Action also raised an objection to Claim 11 under 37 CFR 1.75(c) as being of improper dependent form for failing to further limit the subject matter of a previous claim. In response, applicants have amended Claim 11 to place the claim in proper dependent form and further clarify the subject matter of the claimed invention.

Additionally, the applicants have identified an inadvertent informality on Page 13, line 11, of the disclosure, where Figure 4 is incorrectly identified for discussion. In response, applicants have submitted an amendment, herewith, to further clarify the disclosed subject matter by replacing the phrase “FIGURE 4” with the phrase “FIGURE 3” at Page 13, line 11, of the disclosure.

### II. Rejection Under 35 U.S.C. 112, Second Paragraph

The Office Action rejected Claims 1, 24-28 under 35 U.S.C. 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter of the invention. In particular, The Office Action stated that “the indicated text” in Claim 1, “the

navigation component” in Claims 24-28, and “the slide show” in Claims 25-28 lacked sufficient antecedent basis. In response, applicants have submitted an amendment for Claims 1 and 24-28, herewith, to provide proper antecedent basis and to further clarify the subject matter of the claimed invention.

### III. Rejection under 35 U.S.C. § 102(e).

The Office Action has rejected independent Claims 1, 5, 48 and 50 and dependent Claims 2-3, 6-16, 19-30, 37 and 39 under 35 U.S.C. § 102(e) as being anticipated by Ho et al. U.S. Patent 6,021,412, hereinafter referred to as “Ho”. Applicants disagree with the basis of this rejection and request reconsideration of these claims in view of the following discussion.

Claim 1, subparagraph (a), teaches automatically creating a query related to the indicated object, the query having a data structure that is recognizable by a search engine for the database. As taught in the Specification, various types of objects can be indicated in a document, including, but not limited to, a sentence, paragraph, and image. The query is then created directly from the indicated object (See page 14, lines 8-10).

In contrast, Ho discloses a method for creating a query by “identifying a concept expressed by the ... text” (see column 9, lines 39-40). The concepts are identified by “parsing the portion of the text to identify words that correspond to words in a list of concept words” (see column 9 lines 61-63). Figure 4 shows employing an “AutoClipArt” facility in a presentation application to activate the method disclosed by Ho. After the method is invoked, the steps for creating a query, as shown in Figure 5, include identifying each occurrence of a concept-matching word in a document (501), generating a list of the concept lemmas (502), prompting the user to select a concept lemma (503), identifying representative synonym (505), querying graphics library (506), and displaying the graphics (507).

As indicated by steps 502 and 503 in Figure 5, Ho creates a query for images based on a concept lemma that is indirectly selected. Ho's concept lemma is not a portion of the text in the document that is selected by a user. Instead, a list of concept lemmas is generated by analyzing the entire document; and these generated concept lemmas are provided to the user for selection. A query for images is generated based on the selected concept lemma. Clearly, since Ho's process for creating the query employs an indirectly generated concept lemma and not an indicated object in a document as taught by Claim 1, subparagraph (a), the claimed invention is neither anticipated nor made obvious in view of the cited reference.

Additionally, Claim 1, subparagraph (b), teaches providing the query to the search engine, the search engine searching the database for at least one object that is related to the indicated text. The query provided to the search engine includes enough information about the indicated object so that a related image can be searched for in a database.

In contrast, Ho discloses a method where a facility uses a query to search a graphics library for matching representative synonyms (see column 6, line 7-9). The results of the query are dependent on the subsequent matching of representative concept synonyms (see column 1, lines 64-67). Since Ho's query and synonym search are substantially different than searching for objects that are related to an indicated object, the cited reference does not anticipate or make obvious at least this aspect of claimed invention.

Furthermore, Claim 1, subparagraph (d), teaches producing a display of a related object, so that the related object may be associated with the indicated object. The displaying of the related object, enables its association with the indicated object from which the query was originally created.

In contrast, Ho discloses displaying images that match concept lemmas and enabling the user to insert the returned images in a document that was previously analyzed to indirectly generate the concept lemmas. Clearly, Ho displays a returned image from a query based on concept lemmas that are at least one step removed from the document; and the cited reference does not provide for enabling the association of this returned image with an indicated object in the document that was originally used to create the query. Therefore, the claimed display and association of the related object to the indicated object is neither anticipated nor made obvious by the Ho reference.

Independent Claims 5, 48 and 50 are somewhat similar to independent Claim 1. Claim 5 is directed toward a method for searching, obtaining and displaying images that are related to indicated text in a document. Also, Claim 48 relates to a system with a client-server architecture that implements actions substantially similar to the method taught in Claim 1. Additionally, Claim 50 involves a computer readable medium having computer-executable components that implement actions substantially similar to those in Claim 1. Since independent Claims 5, 48 and 50 are substantially similar to Claim 1, these claims are not anticipated or made obvious for at least the same reasons in regard to Claim 1.

Claim 2 teaches that the indicated object and the related object include data comprising video, picture, sound, and text. The Office Action has indicated that Ho discloses types of multimedia artifacts that may be added to a document. However, a review of the cited reference did not locate any mention of an indicated object that can include multimedia data. Instead, Ho appears to be directed to specifying concept-matching words, not an indicated object in a document that can include data comprising video, picture, sound, and text. Thus, Claim 2 is not anticipated or made obvious by the Ho reference.

In regard to Claim 3, subparagraph (a) teaches enabling a qualification engine to determine a context of the indicated object. Although the Office Action has indicated that the Ho reference (column 1, lines 50-65) substantially teaches the claimed method, an inspection of this citation resulted in a different conclusion. Instead, the cited reference describes a method for matching concept words to synonyms, which is not directed to indicated objects, context, or a qualification engine.

Furthermore, Claim 3, subparagraph (b), teaches employing the context of the indicated object to create a query. The Office Action indicated that Ho teaches this method at column 1, lines 63-67. However, this citation of the Ho reference describes how synonyms are matched to descriptive words in the graphic library. Thus, since Ho does not teach or suggest either element of Claim 3, the cited reference does not anticipate or make obvious the claimed invention.

Claim 6 teaches employing a user interface component to automatically create a query for the database, the creation of the query being related to the indicated text. Figure 1 shows one embodiment of the claimed user interface. In Figure 1, the context menu 104 lists a single entry ("Imagizer") that when selected will automatically cause a query for the database to be created, the query being related to the indicated text 106.

In contrast, the Ho reference discloses displaying a dialog box where the user selects from a list of representative concept synonyms that are compiled from a document. The steps illustrated in Ho's Figures 7-9 clearly show that the cited reference does not suggest or disclose the claimed invention. Therefore, Claim 6 is neither anticipated nor made obvious by the Ho reference.

Claim 7 teaches enabling the editing of indicated text with the user interface component. The user interface, as shown in Figure 3, illustrates enabling a user to edit text that was originally

indicated in the document (see text box 130). Although editing the indicated text may alter the query, the text in the original document remains unchanged.

In contrast, Ho teaches enabling the examination of each word in a document as the user inputs it (see column 3, lines 64-65). However, Ho does not suggest or disclose directly editing the query without causing an alteration to the original document. Thus, since the ability to edit the indicated text without changing the original document is not taught or suggested by the Ho reference, Claim 7 is neither anticipated nor made obvious.

Claim 8 teaches enabling the indicated text to be chosen in the document with a user interface component. One embodiment is demonstrated in Figure 1, where the word 'sail' has been selected/indicated in a document.

In contrast, Ho discloses a method where indicated text cannot be chosen in a document. In Ho, the entire document is scanned for words that match a list of concept words (see Column 3, lines 40-44). Only then may a user select from a limited list of concepts gleaned from the document (see Column 3, lines 46-47). Thus, Ho does not disclose or suggest employing a user interface to choose specific words in a document to be indicated text. Furthermore, Claim 8 is neither anticipated nor made obvious in view of the cited reference.

Claim 9 teaches choosing indicated text in a document for a query of a database from within an application program that provides the document. In support of this claim, the Specification discusses an exemplary email program (Figure 1) and shows how text in an email message (document) can be indicated. A user can pick and choose which text in the document that they want to use to create the query (see Claim 5).

In contrast, Ho discloses a method where the user cannot indicate particular text. Rather, the Ho reference teaches scanning a document for words that match a list of concept words (see

column 3, lines 40-44). A user may then select from a limited list of concepts gleaned from the document (see column 3, lines 46-47). Clearly, since the Ho reference does not teach or suggest enabling the choosing of specific text within an application program that is used for a query, Claim 9 is neither anticipated nor made obvious in view of the cited reference.

Claim 10 teaches choosing a command to create the query for the indicated text, the command including an indication in at least one of a context menu, drop-down menu, pop-up window, dialogue box, toolbar, and hot key. As disclosed in the Specification, when an object is indicated, then a command can be invoked to create the query related to the indicated object (see page 8, lines 17-19).

In contrast, Ho discloses a method where a facility searches for matching concepts across an entire document, maps them to representative concept synonyms, and then searches a graphics library (see figure 5, steps 501-506). Therefore, Ho does not anticipate or make obvious Claim 10 and the claimed invention is allowable.

Claim 11 teaches choosing the indicated text in a document for a query of a database from an application program that is separate from another application program that provides the document. In this way, a user may pick and choose which text they want to use to create the query.

In contrast, Ho discloses a method where the user cannot indicate particular text in the document. Rather, Ho teaches scanning the document for words that match a list of concept words (see column 3, lines 40-44). Next, a user may select from a limited list of concepts gleaned from the document (see column 3, lines 46-47). Thus, since Ho does not teach or suggest the subject matter of Claim 11, this claim is neither anticipated nor made obvious by the cited reference.

Claim 13 subparagraph (a), teaches a method for enabling a qualification engine to determine a context of the indicated text within the document. The Office Action cited the Ho reference at column 1, lines 50-65 as teaching this aspect of the claimed invention. However, a survey of the cited passage found a discussion of matching concept words to synonyms. Further, nowhere in the cited reference was found even a suggestion regarding an indicated object in a document, context, or a qualification engine.

Furthermore, Claim 13, subparagraph (b) teaches providing the context of the indicated text to the user interface component, the user interface component employing the context of the indicated text to automatically create the query for the database. The Office Action indicated that Ho teaches (Figures 6-9) this aspect of the claimed invention. However, an inspection of these figures and the accompanying text found a discussion of how the user may select from a list of concept matching words. Nowhere in the Ho reference is there a suggestion or teaching for the use of context as taught by Claim 13. Thus, the cited reference does not anticipate nor make obvious Claim 13.

Claim 14 teaches that the determined context of indicated text may include text, template, sound, video, picture, use and user preference. The Office Action has indicated that the Ho reference discloses types of multimedia artifacts that can be added to the document (see column 9, lines 25-28). However, the cited reference discloses adding audio sequences, holograms, images, or video clips to the document. Since the Ho reference does not disclose or suggest a determined context that can include the stated types of context, Claim 14 is not anticipated or made obvious by the cited reference.

Claims 15 and 19-21 teach methods for a query that is created to locate an image related to indicated text. The query enables a search engine to locate an image related to the indicated



text. In contrast, Ho discloses searching a graphics library containing a concept table for mapping from words found in a document to conceptual descriptive words associated with graphics stored in the graphics library (see column 6, lines 4-90). Therefore, since Ho does not disclose the use of a query and search engine to locate images related to indicated text, the cited reference does not anticipate or make obvious Claims 15 and 19-21.

Claim 24 teaches a navigation component that enables the display of a group of related images in a slide show. The group of related images are indicated in the result from the query. Figure 3 shows an exemplary embodiment of the claimed invention where related images are placed into groups of 50 when the results of the query are more than 50 images. Control buttons 134 and 136 enable different groups of images to be selected for display.

In contrast, Ho discloses no grouping of images and all of the images are placed together regardless of the total number found (Figures 10 and 11). Therefore, Claim 24 is not anticipated or made obvious in view of the Ho reference.

Additionally, Claim 24 teaches displaying images in a slide show. As shown in Figure 2, forward button 124 and backwards button 120 enable the sequential display of the results of the query, i.e., the related images. Also, the selection of the "Play" button 122 causes the images to change at regular intervals as the control for display moves forward through the results (group of images). In contrast, Ho discloses simultaneously displaying several thumbnail images and enabling manual navigation of the images (Figures 10 and 11). Thus, since a slide show is not taught or suggested in Ho, Claim 24 is not anticipated or made obvious in view of the cited reference.

Claim 25 teaches a navigation component that enables another group of related images to be displayed in a slide show. In Figure 3, an exemplary embodiment is shown where buttons

134 and 136 enable the selective display of separate groups of images. Nowhere in the Ho reference is there a teaching or suggestion for either a grouping of images or a slide show. Since the Ho reference does not anticipate or make obvious the claimed invention, Claim 25 is allowable.

Claims 26-28 teach a navigation component that includes controls for determining a period of time that each related image is displayed in the slide show. An indication is provided for the number of the related image in the group that is currently displayed in the slide show. Also, an indication is provided for each group of related images that is currently displayed in the slide show. In Figures 2 and 3, an exemplary embodiment of the claimed invention is shown (138, 135, 118). In contrast, Ho does not disclose a slide show or the claimed features. Thus, Claim 26 is not anticipated or made obvious by the Ho reference.

Claim 37, subparagraph (a) teaches a method where each instance that indicated text is employed to create a query, the indicated text is automatically saved as an entry in a history file. Information about the indicated text is kept in order to enable other features including allowing the user to re-run queries or review previous searches (see page 5, lines 16-19 and page 13, lines 19-20). In contrast, the method disclosed in Ho does not use indicated text to create a query, nor does it keep a history file of such text. Thus the Ho reference does not teach or suggest this aspect of Claim 37.

Furthermore, Claim 37, subparagraph (b) teaches enabling at least one of the entries in the history file to be chosen for the currently indicated text. In this way, previously indicated text can be easily reused to create another query. In contrast, Ho does not use indicated text to create a query, nor does it suggest or disclose keeping a history of text used to create a query.

Thus, Ho does not anticipate or make obvious this aspect of Claim 37. Therefore, Claim 37 is neither anticipated nor obvious in view of the cited reference.

Claim 39 teaches automatically determining a word that is closest to a cursor when no indicated text is provided and employing the determined word as the indicated text to use to create a query. (See page 5, lines 24-25 and at page 9, lines 1-3). In contrast, the pointer mentioned in Ho at column 7, lines 15-20 (as cited by the Office Action), is used to track the facility's current position as it searches for concept matching words. Because the cursor taught in Claim 39 operates significantly different than the pointer disclosed in Ho, the cited reference neither anticipates nor makes obvious the claimed invention.

Claim 48, subparagraph (a), part (i) teaches enabling an automatic creation of a query based on the indicated text. The created query has a data structure that is recognizable by a search engine for the database. The query can be created directly from the indicated text. (See page 14, lines 8-10).

In contrast, Ho discloses a requirement for "identifying a concept expressed by the ... text". (See column 9, lines 39-40). The concepts are identified by "parsing the portion of the text to identify words that correspond to words in a list of concept words". (See column 9 lines 61-63). In Figure 5, the Ho reference illustrates steps where the concept matching words are identified (step 501), mapped to concept lemmas (step 502), and lemmas are mapped to concept representative synonyms (step 505) all before a query is performed on the database (step 506). Therefore, the Ho reference does not anticipate or make obvious this aspect of Claim 48.

Additionally, Claim 48 subparagraph (a) part (ii) teaches providing a query to a search engine that searches a database for an image that is related to indicated text. It is the query provided to the search engine that describes the indicated text in such detail that a related image

may be located. In contrast, Ho discloses a facility that queries a graphics library to search for matching representative synonyms (see column 6, line 7-9). The query is directed to finding images that have concepts that match a list of synonyms from a document. The results of the query are dependent on matching representative concept synonyms (See column 1, lines 64-67). The claimed invention searches for images that are related to the indicated text, while Ho discloses searching for images that match concepts via synonyms. Therefore, the Ho reference does not anticipate or make obvious this aspect of Claim 48.

Also, Claim 48, subparagraph (a) part (iii) teaches enabling a display of at least one related image indicated by the result from the query. The display of a related image is selectable for insertion into the document. By enabling the display of the related object, it can be associated with the indicated text from which the query was originally created.

In contrast, Ho displays images that match concept words so that a user may select them for insertion into a document. Because the Ho reference gleans its concept words by scanning the entire document, it does not allow the association of indicated text with a related image as taught by the claimed invention. Thus, this aspect of Claim 48 is neither anticipated nor made obvious by the Ho reference.

Furthermore, Claim 48, subparagraph (a), part (iv) teaches displaying a related image that is inserted into a document where the related image is associated with indicated text. As discussed above, Ho teaches gleaning its concept words from throughout a document, and the cited reference does not enable the association of a related image with indicated text in a document. Therefore, another aspect of Claim 48 is not anticipated or made obvious by the Ho reference.

Moreover, Claim 48 subparagraph (b) part (i) teaches returning a result from a query of a database. The result indicates when at least one image in the database is related to the indicated text. The Office Action has indicated that Ho teaches this aspect of the claimed invention at column 3, lines 25-30. However, the text at this citation does not appear to discuss returning results of any type. Rather, this portion of the Ho reference discusses searching for images in a graphics library when a matching concept word is found, but the actual information included in the result is not disclosed or suggested. Therefore, the Ho reference does not anticipate or make obvious yet another aspect of Claim 48.

Additionally, Claim 48, subparagraph (b), part (ii) teaches enabling a search engine to locate at least one image in a database that is related to indicated text. In contrast, Ho discloses performing searches based on concept synonyms, not indicated text in a document. Thus, another aspect of Claim 48 is not anticipated or made obvious in view of the Ho reference.

Independent Claim 50 is directed to a computer-readable medium that includes computer executable components. Also, several aspects of Claim 50 are substantially similar to independent Claim 5, albeit different in other ways. Thus, Claim 50 is at least allowable for the same reasons discussed in regard to Claim 5.

Also, dependent Claims 29 and 30 are not anticipated or made obvious by the Ho reference for at least the same reasons as independent Claim 5, upon which they also depend. Additionally, dependent Claims 16, 22, and 23 are not anticipated or made obvious by the Ho reference for at least the same reasons as Claims 15 and 21, upon which they depend.

Additionally, the Ho reference does not anticipate or make obvious dependent Claims 3, 12, 16, 22, 23, 29 and 30 for at least the same reasons as the independent claims, upon which they depend.

**III. Claims rejected under 35 U.S.C. § 103.** The Examiner rejected Claims, 4, 18, 31-36, 38, 40-47, 49, and 51-53 under 35 U.S.C. § 103(a) as being unpatentable over Ho et al. (U.S. Patent 6,021,412) and in view of Balogh et al, U.S. Patent No. 5,493,677. Hereinafter referred to as "Balogh". The Office Action also rejected independent Claim 17 as being unpatentable over Ho in view of Baru et al, U.S. Patent No. 6,021,412. Hereinafter referred to as "Baru". Applicants disagree with the basis of this rejection and request reconsideration of these claims in view of the following discussion.

In regard to Claim 4, the Office Action stated that it would have been obvious to one of ordinary skill in the art at the time of the invention to combine Ho's database searching method with Balogh's purchasing step. However, this combination would not have been obvious because these references disclose different methods that solve different problems. For example, Ho discloses searching a graphics library where concept-matching words are identified (figure 5, step 501), mapped to concept lemmas (step 502), and lemmas are mapped to concept representative synonyms (step 505) before querying the database (step 506). Ultimately, graphics may be added to a document for illustrating concepts referred to therein (see column 1, line 38-40).

In comparison, images in Balogh are archived and retrieved by associating metadata with an image, the metadata including bibliographic data, a caption, and a set of suggestions evoked by the image, removing ambiguities from the metadata, storing the image and metadata in a database with other images and metadata, and selecting certain images from the database that have metadata corresponding to a user's search request. (See column 1, lines 56-64). Images and their associated metadata are analyzed and cataloged using natural language processing.

Balogh's image retrieval is also accomplished by using the natural language processing to analyze user requests.

Also, there is no teaching in the Ho and Balogh references that would suggest combining the functionality of these references. Ho clearly teaches away from the precision necessary to effectively practice Balogh's natural language processing method. For example, Ho's use of a fixed set of synonyms relies upon a certain level of ambiguity in order to find a range of images in a graphics library. Further, one given example in Ho discloses searching for images to match the concept of 'Leadership' and returning several different images that cover the broadest definition of leadership. (See column 6, lines 27-32). On the other hand, Balogh expends considerable effort to avoid ambiguity. In particular, the Balogh specification discloses a detailed method for resolving precise meanings. (See Figure 4; Figure 10, steps 1003-1011; column 6, line 28 to column 7, line 25; and column 12, line 57 to column 13, line 57). Also, the purchase step disclosed in Balogh discloses delivery of images in physical media (slides or prints) or electronic media using conventional bulletin boards. (See column 18, lines 2-4).

In contrast, Claim 4 does not teach employing a bulletin board to deliver the related object over the network or natural language processing. In the Specification, a variety of network protocols and other vehicles are suggested for delivery. For example, transmission control protocol/internet protocol (TCP/IP), file transfer protocol (FTP) and the hyper text transport protocol (HTTP), or email may be employed to deliver the related object, but no bulletin board is mentioned. (See page 12, lines 10-15; page 9, line 22 to page 10, line 2). Thus, since the suggested combination of Ho and Balogh is untenable, Claim 4 is non-obvious in view of the cited references.

In regard to Claim 31, the claimed invention teaches including a digital watermark with a related image. The digital watermark can include information related to the content of the related image. As disclosed in the Specification, this information may indicate a copyright or identify the contents of the image. (See page 21, lines 11-12 and lines 17-18). In contrast, Balogh discloses a method where a watermark is specifically designed to prevent unlicensed use of the images. In particular, the watermark limits the viewing of images to a relatively low resolution computer monitor and prevents a user from creating a high-quality print of the image. (See column 10, lines 50-56). Also, Balogh's watermark operates as a digital mask that is tiled across the entire image. For example, the blue component of the image (in the RGB color space) is altered for pixels matching the digital mask. (See column 10, lines 56-59). Although both the claimed invention and Balogh refer to watermarks, this is a gross generalization of a technology that does not reflect the distinct nature and functionality of the separate methods. Therefore, Claim 31 is not obvious in view of the suggested combination of the Ho and Balogh references.

Claim 32 teaches including a cookie with a query, the cookie including information related to the user. The Office Action stated that Balogh teaches this method (see column 9, lines 15-35). However, an inspection of the cited reference reveals that Balogh discloses verifying a user's credentials for security and auditing purposes. In contrast, Claim 32 teaches adding a cookie to a query sent to a database. The cookie information may include user preferences such as formats, file sizes, color depth, and picture quality. Thus, Claim 32 is not made obvious by the suggested combination of the Ho and Balogh references.

Claim 38 teaches embedding a URL with a related image that is pasted into a document where the URL provides a link to information associated with the related image. At a later date,



a user may select a related image, navigate the URL, and locate information associated with the related image. In contrast, Balogh discloses a caption or bibliographic information for an image that may be accessed from within a User Interface on a user's workstation. However, once the image has been delivered, the location of this information is lost and cannot be easily relocated. Thus, since Balogh does not teach or suggest a persistent method for maintaining the location of information related to an image, Claim 38 is not made obvious in view of the suggested combination of cited references.

Claim 42 teaches a network component that employs a proxy server to automatically connect to a search engine for a database. In the Specification, an HTTP or other TCP/IP proxy server is used to connect to an intranet or the Internet. In contrast, Balogh discloses a proxy server that performs routing and communication management functions. (See Figure 11; column 16, lines 29-32). Clearly, Balogh's proxy server is not functionally similar to the claimed invention. Thus, Claim 42 is not made obvious in view of the suggested combination of cited references.

Claim 43 teaches a network component that employs a dial-up facility to automatically connect to a search engine for a database. In contrast, Balogh discloses a communication layer that may utilize a modem. However, Balogh does not suggest or disclose a dial-up facility to establish a connection if one does not already exist. (See column 16, lines 27-29). Thus, Claim 43 is not made obvious by the suggested combination of the Balogh and Ho references.

Claim 51, subparagraph (a), teaches automatically creating a query related to an indicated object, where the query includes a data structure that is recognizable by a search engine for a database. As disclosed in the Specification, a user can select a sentence, paragraph, or an image

in a document. The query could then be created directly from the object indicated by the selection (See page 14, lines 8-10).

In contrast, Ho discloses a method requiring “identifying a concept expressed by the ... text”. (See column 9, lines 39-40). The concepts are identified by “parsing the portion of the text to identify words that correspond to words in a list of concept words”. (See column 9, lines 61-63). In figure 5, Ho illustrates the steps where the concept matching words are identified (step 501), mapped to concept lemmas (step 502), and lemmas are mapped to concept representative synonyms (step 505) before querying the database (step 506). Clearly, Ho’s technique for locating images is distinct from the claimed query that includes a data structure recognizable by a search engine. Thus, the suggested combination of the Ho and Balogh references does not make obvious this aspect of Claim 51.

Furthermore, Claim 51, subparagraph (b), teaches providing a query to a search engine that searches a database for at least one image that is related to the indicated object. It is the query provided to the search engine, which describes the indicated object with sufficient particularity that a related image may be located in the database by the search engine.

In contrast, Ho discloses a method where a facility queries a graphics library to search for matching representative synonyms. (See column 6, line 7-9). The Ho query enables searching for images that have concepts that match a list of synonyms from a document. The results of Ho are solely dependent on matching representative concept synonyms. (See column 1, lines 64-67). Clearly, Claim 51 teaches searching for images that are related to an indicated object, while Ho discloses searching for images that match concepts via synonyms. Therefore, the suggested combination of the Ho and Balogh references does not make obvious another aspect of Claim 51.

Additionally, Claim 51, subparagraph (c), teaches returning a result from a query of a database, where the result indicates when at least one image is related to the indicated object. The Office Action noted that Ho teaches the claimed invention at Column 1, lines 63-67. However, the text at this citation does not discuss returning results for a query. Instead, the cited reference discusses searching for images in a graphics library if a matching concept word is found. The actual information that is returned by a query is not mentioned or suggested. Thus, the suggested combination of the Ho and Balogh references does not make obvious yet another aspect of Claim 51.

Moreover, Claim 51, subparagraph (d), is substantially similar to dependent Claim 4, albeit different in other ways. Thus, this aspect of Claim 51 is non-obvious for at least the same reasons in view of the suggested combination of Ho and Balogh.

Also, Claim 51, subparagraph (e), teaches when a related image is purchased, a display of the related image is enabled, so that the related image may be associated with the indicated object from which the query was originally created. In contrast, Ho discloses displaying images that match concept words so that a user may insert a chosen image into a document. Also, because Ho discloses gleaning its concept words by scanning the entire document, the cited reference does not teach or suggest associating the image with an indicated object. Thus, another aspect of Claim 51 is non-obvious in view of the suggested combination of the Ho and Balogh references.

Claim 52 teaches an indicated object that may include data such as video, picture, sound, and text. As described in the Specification, various types of indicated objects may be employed to directly form a query of a database. (See page 2, lines 16-17). Although the Office Action indicated that the Ho reference at Column 9, lines 25-30, disclosed the claimed invention, a close

inspection of the cited reference revealed a discussion of the types of multimedia artifacts that may be added to a document. Nowhere in the Ho reference is there a teaching or suggestion that various types of objects in a document may be indicated for directly creating a query of a database. Thus, Claim 52 is non-obvious in view of the suggested combination of Ho and Balogh. Claim 53, subparagraph (a) teaches enabling a qualification engine to determine a context of the indicated object. The Office Action indicated that the Ho reference disclosed this aspect of the claimed invention at Column 1, lines 50-65. However, the Ho reference at this citation describes matching concept words to synonyms and it does not teach or suggest the claimed invention. Thus, this aspect of Claim 53 is non-obvious in view of the suggested combination of Ho and Balogh.

Furthermore, Claim 53, subparagraph (b) teaches employing the context of an indicated object to automatically create a query for a database. The Office Action indicated that the Ho reference teaches this aspect of the claimed invention at Column 1, lines 63-67. However, this citation in the Ho reference describes how synonyms are matched to descriptive words in the graphic library. Further, there is no teaching or suggestion the Ho reference of employing context to automatically create a query. Therefore, another aspect of Claim 51 is non-obvious in view of the suggested combination of Ho and Balogh.

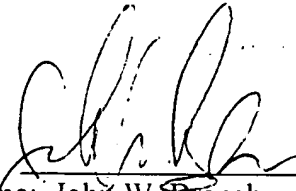
Claim 17 teaches a query that includes an XML data structure. The Specification discusses how the query's data structure is determined by what formats the database is capable of recognizing (see page 2, lines 10-11). In this way, the claimed XML data structure may be employed to flesh-out various parts of the query.

In contrast, Baru discloses a method where an *XML Matching and Structure* query language is used to model and query information in distributed, heterogeneous information sources. (See page 214, column 1, line 3 under "1. INTRODUCTION"). The Baru query and data models are composed in the *XML Matching and Structure* query language. Thus, since the claimed invention and the Baru reference employ different types of XML data structures in very different ways, the suggested combination of Ho and Baru does not make Claim 17 obvious.

Additionally, dependent Claims 18, 33-36, 40, 41 44-47 and 49 are not obvious for at least the same reasons as discussed above in regard to the independent claims, upon which they depend.

**IV. Conclusion** Applicants respectfully submit that Claim 11 complies with 37 CFR 1.75(c), that the disclosure informalities stated in the July 3<sup>rd</sup> Office Action have been corrected, that Claims 1 and 24-28 as amended comply with 35 U.S.C. 112, second paragraph, that independent Claims 1, 5, 48 and 50 and dependent Claims 2-3, 6-16, 19-30, 37 and 39 are not anticipated or made obvious by Ho, that independent Claim 51 and dependent Claims 4, 18, 31-36, 38, 40-47, 49, 52 and 53 are patentable under 35 U.S.C. § 103(a) over Ho in view of Balogh, and that dependent Claim 17 is patentable under 35 U.S.C. § 103(a) over Ho in view of Baru.

MERCHANT & GOULD P.C.  
P.O. Box 2903, Minneapolis, MN 55402-0903  
206.342.6200

By:   
Name: John W. Branch  
Reg. No.: 41,633  
Direct Dial: 206.342.6252





MARKED VERSIONS OF AMENDED CLAIMS SHOWING CHANGES

1. (Amended) Method for searching a database to obtain an object that is related to an indicated object in a document, comprising:

(a) automatically creating a query related to the indicated object, the query having a data structure that is recognizable by a search engine for the database;

(b) providing the query to the search engine, the search engine searching the database for at least one object that is related to the indicated [text] object;

(c) returning the result from the query of the database, the result indicating when at least one object is related to the indicated [text] object; and

(d) producing a display of a related object, so that the related object may be associated with the indicated object.

11. (Amended) The method of Claim [9] 8, further comprising choosing the indicated text in the document for the query of the database from an application program that is separate from another application program that provides the document.

24. (Amended) The method of Claim 21, wherein [the] a navigation component enables the display of a group of related images in a slide show, the group of related images being indicated in the result from the query.

25. (Amended) The method of Claim [21] 24, wherein the navigation component enables another group of related images to be displayed in the slide show, the other group of related images being indicated in the result from the query.

26. (Amended) The method of Claim [21] 24, wherein the navigation component includes a control for determining a period of time that each related image is displayed in the slide show.

Although image retrieval is also accomplished by using the natural language processing to

27. (Amended) The method of Claim [21] 24, wherein the navigation component includes a control for indicating the number of the related [image] images in the group that is currently displayed in the slide show;

28. (Amended) The method of Claim [21] 25, wherein the navigation component includes a control for indicating each group of related images that are currently displayed in the slide show.

The present invention provides a system and method for displaying a group of images in a slide show. The system includes a navigation component that would suggest combining

the images in the slide show into a group of related images.

The method includes the steps of:

a. displaying a slide show of images; and

b. displaying a control for indicating the number of the related images in the group that is currently displayed in the slide show.

The method further includes the step of:

c. displaying a control for indicating each group of related images that are currently displayed in the slide show.

The method further includes the step of:

d. displaying a control for indicating the number of the related images in the group that is currently displayed in the slide show.

The method further includes the step of:

e. displaying a control for indicating each group of related images that are currently displayed in the slide show.

The method further includes the step of:

f. displaying a control for indicating the number of the related images in the group that is currently displayed in the slide show.

The method further includes the step of:

g. displaying a control for indicating each group of related images that are currently displayed in the slide show.